

May 9, 2002

Phyllis Hockett
Indiana Department of Transportation
100 North Senate Avenue N848
Indianapolis, IN 46204

Re: Registered Construction and Operation Status,
071-13764-00031

Dear Ms. Hockett:

The application from the Indiana Department of Transportation, received on December 5, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following, to be located at 157 Agrico Lane in Seymour, Indiana 47274, is classified as registered:

- (a) one (1) asphalt extraction process, with a maximum process rate of 13 lbs/process, with emissions exhausted through stacks H503EF3, H503EF4, H503EF5, and H503EF 20.
- (b) one (1) asphalt emulsion process with a maximum process rate of 0.5 gallon of liquid asphalt per process, with emissions exhausted through stacks H503EF6, H503EF7, H503EF8, H503EF9, H503EF10, H503EF11, and H503EF12.
- (c) one (1) asphalt cement process with a maximum process rate of 1 quart of bituminous material per process, with emissions exhausted through stacks H503EF6, H503EF7, H503EF8, H503EF9, H503EF10, H503EF11, and H503EF12.
- (d) one (1) soil compaction process with a maximum process rate of 100 lbs/day, with emissions exhausted through stacks H503-17, H503EF18, and H503EF19.
- (e) one (1) coarse and fine aggregate testing process with a maximum process rate of 180 lbs/day, with emissions exhausted through stack H503EF13.
- (f) one (1) aggregate compaction process with a maximum process rate of 100 lbs/day, with emissions exhausted through stacks H503EF13, H503EF17, H503EF18, and H503EF19.
- (g) one plastic index and liquid limit process with a maximum process rate of 100 lbs/day with emissions exhausted through stacks H503EF17, H503EF18, and H503EF19.
- (h) one (1) sulfur capping process with a maximum process rate of 15 lb/wk, with emissions exhausted through stacks H503EF14, H503EF15, H503EF16, and H503EF21.
- (i) thirty-nine (39) miscellaneous natural gas fired combustion units with a combined capacity of 11.07 MMBtu/hr.
- (j) one (1) maintenance surface coating booth, identified as H50033, with a maximum production rate of 1 unit/hr, with particulates controlled by a dry filter system.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

- (2) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the soil compaction, aggregate testing, aggregate compaction, and plastic index and liquid limit processes shall be limited to 0.551 lb/hr.

Interpolation and extrapolation of the data for a process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the following equation:

$$E = 4.10 * P^{0.67}$$

where: E = rate of emission in pounds per hour,
P = process weight in tons per hour

- (3) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the surface coating booth shall not exceed the limits established utilizing the following equation:

$$E = 4.10 * P^{0.67}$$

where: E = rate of emission in pounds per hour,
P = process weight in tons per hour

- (4) Any change or modification to the surface coating booth which would increase actual emissions of VOC to fifteen (15) pounds per day or more shall obtain prior approval from IDEM, OAQ, and shall be subject to the requirements of 326 IAC 8-2-9.

The owner or operator shall maintain records on a daily basis of the amount and VOC content of each coating material and solvent used. Said records shall be kept for a minimum period of five years and shall be made available to the OAQ upon request.

This registration is the first renewal of the existing registration for the source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to (326 IAC 2-5.1-2(f)(3) or 326 IAC 2-5.5-4(a)(3)). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

no later than March 1 of each year, with the annual notice being submitted in the format attached.

Any change or modification which may increase the potential pollutant emissions to 25 tons per year or more from the equipment covered in this registration must be approved by the Office of Air Quality (OAQ) before such change may occur.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

SDF

cc: File: Jackson County
Jackson County Health Department
Air Compliance Section - Joe Foyst
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) or 326 IAC 2-5.5-4(a)(3).

Company Name:	Indiana Department of Transportation
Address:	157 Agrico Lane
City:	Seymour, Indiana 47274
Authorized individual:	
Phone #:	
Registration #:	071-13764-00031

I hereby certify that The Indiana Department of Transportation is still in operation and is in compliance with the requirements of Registration 071-13764-00031.

Name (typed):
Title:
Signature:
Date:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for Registration Operation Status

Source Background and Description

Source Name:	Indiana Department of Transportation
Source Location:	157 Agrico Lane, Seymour, Indiana 47274
County:	Jackson
Registration No.:	071-13764-00031
SIC Code:	1611 and 1612
Original Registration No.:	071-5372-00031, issued on May 9, 1996
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed an application from the Indiana Department of Transportation relating to the addition of a surface coating touch-up booth to their existing source. The source emission units, including the proposed paint booth, is listed below.

- (a) one (1) asphalt extraction process, with a maximum process rate of 13 lbs/process, with emissions exhausted through stacks H503EF3, H503EF4, H503EF5, and H503EF 20.
- (b) one (1) asphalt emulsion process with a maximum process rate of 0.5 gallon of liquid asphalt per process, with emissions exhausted through stacks H503EF6, H503EF7, H503EF8, H503EF9, H503EF10, H503EF11, and H503EF12.
- (c) one (1) asphalt cement process with a maximum process rate of 1 quart of bituminous material per process, with emissions exhausted through stacks H503EF6, H503EF7, H503EF8, H503EF9, H503EF10, H503EF11, and H503EF12.
- (d) one (1) soil compaction process with a maximum process rate of 100 lbs/day, with emissions exhausted through stacks H503-17, H503EF18, and H503EF19.
- (e) one (1) coarse and fine aggregate testing process with a maximum process rate of 180 lbs/day, with emissions exhausted through stack H503EF13.
- (f) one (1) aggregate compaction process with a maximum process rate of 100 lbs/day, with emissions exhausted through stacks H503EF13, H503EF17, H503EF18, and H503EF19.
- (g) one plastic index and liquid limit process with a maximum process rate of 100 lbs/day with emissions exhausted through stacks H503EF17, H503EF18, and H503EF19.
- (h) one (1) sulfur capping process with a maximum process rate of 15 lb/wk, with emissions exhausted through stacks H503EF14, H503EF15, H503EF16, and H503EF21.
- (i) thirty-nine (39) miscellaneous natural gas fired combustion units with a combined capacity of 11.07 MMBtu/hr.
- (j) one (1) maintenance surface coating booth, identified as H50033, with a maximum production rate of 1 unit/hr, with particulates controlled by a dry filter system.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities at this source.

Existing Approvals

The source was issued registration 071-5372-00031 on May 9, 1996. The source has been operating under this registration. On December 5, 2000, the Indiana Department of Transportation (INDOT) submitted an application for re-registration (071-13764-00031). This registration was signed but not issued due to the source's failure to pay for the review. On July 5, 2001, INDOT submitted an application for a new surface coating booth to be added to the source. Based on the status of the re-registration and the proposed surface coating booth, it is determined that the booth shall be included as part of re-registration 071-13764, but the source shall be charged \$600 instead of \$100 for the filing fee because the new equipment requires \$500 for its review.

Registration 071-13764-00031 shall cover all units at the source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
H503EF3	18.5	1 X 1	1440	ambient
H503EF4	18.5	1.3 X 1.3	1920	ambient
H503EF5	18.5	1.17 X 1.17	1600	ambient
H503EF6	18.5	1.17 X 1.17	1600	ambient
H503EF7	18.5	1.17 X 1.17	1680	ambient
H503EF8	18.5	1.33 X 1.33	2800	ambient
H503EF9	18.5	1.33 X 1.33	3230	ambient
H503EF10	18.5	1.17 X 1.17	1500	ambient
H503EF11	18.5	1 X 1	1680	ambient
H503EF12	18.5	1.17 X 1.17	1920	ambient
H503EF13	18.5	1.33 X 1.33	1920	ambient
H503EF14	18.5	1.33 X 1.33	1680	ambient
H503EF15	18.5	1.17 X 1.17	1680	ambient
H503EF16	18.5	1.33 X 1.33	1920	ambient
H503EF17	18.5	1 X 1	720	ambient
H503EF18	18.5	1.17 X 1.17	1600	ambient
H503EF19	18.5	1.33 X 1.33	1600	ambient
H503EF20	18.5	1.33 X 1.33	2200	ambient
H503EF21	18.5	0.67 X 0.67	250	ambient
H503EF22	18.5	2.00	25200	ambient

Recommendation

The staff recommends to the Commissioner that this Registration be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

Emission Calculations

UNRESTRICTED POTENTIAL TO EMIT

1. Combustion Emissions:

The following calculations determine the combustion unrestricted potential to emit (UPTE) based on a combined capacity of 11.07 MMBtu/hr, natural gas combustion, 8,760 hours of operation, and emission factors obtained from EPA, AP-42.

Throughput = Capacity (MMBtu/hr) * 8760 hr/yr * 1/1000 MMcf/MMBtu
Emissions (tons/yr) = Throughput (MMcf/yr) * Emission Factor (lb/MMcf) * 1/2000 lb/ton

Ef (lb/MMcf)	PM 12.0	PM10 12.0	SO2 0.60	NOx 100.0	VOC 5.3	CO 21.0
UPTE (tons/yr)	0.60	0.60	neg.	4.90	0.30	1.00

2. Process PM Emissions:

a. Soil Compaction, Aggregate Testing, Aggregate Compaction, Plastic Index and Liquid Limit:

The following calculations determine the UPTE from the soil compaction, aggregate testing, aggregate compaction, and plastic index and liquid limit processes based on a worst case emission rate of 1.1 lb PM/hr for one process, emissions before controls, and 8760 hours of operation.

$$1.1 \text{ lb PM/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} * 4 \text{ processes} = \mathbf{19.3 \text{ tons PM/yr}}$$

PM10 is determined to be equal to PM in this case.

b. Surface Coating Booth:

The following calculations determine the surface coating booth UPTE based on the worst case coating scenario, the MSDS parameters from each applicable coating/solvent, emissions before controls, and 8760 hours of operation.

The worst case combination assumes the worst case coating, with the worst case binder, activator, reducer, additive, and tint used at the booth, and the use of solvent, gun cleaner, and eradicator.

$$\text{Tons PM/yr} = \text{lb/gal} * \text{gal/unit} * \text{unit/hr} * (1 - \text{frac. VOC}) * (1 - \text{TE}) * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb}$$

PM10 is determined to be equal to PM in this case.

Material	ID	lb/gal	frac. VOC	gal/unit	unit/hr	TE	tons PM/yr
Coating	V-7500S	7.80	1.00	0.0096	1	0.50	0.16
Binder	7175S	6.63	0.99	0.0024	1	0.50	0.03
Activator	7699	8.24	0.62	0.0005	1	0.50	0.01
Reducer	8022S	6.57	1.00	0.0016	1	0.50	0.02
Additive	259S	7.20	0.99	0.0005	1	0.50	0.01
Tint	C9335J	7.35	0.80	0.0024	1	0.50	0.04
Gun Cleaner	CGC111	6.52	1.00	0.0096	1	0.50	0.14
Cleanup Solvent	3919S	6.40	1.00	0.0024	1	0.50	0.03
Eradicator	F006	6.51	0.99	0.0048	1	0.50	0.07
Total							0.52

3. SO₂ Emissions From the Capping Process:

The following calculations determine the SO₂ UPTE from the capping process based on a maximum emission rate of 0.9 lb SO₂/hr, emissions before controls, and 8760 hours of operation

$$0.9 \text{ lb SO}_2/\text{hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \mathbf{3.94 \text{ tons SO}_2/\text{yr}}$$

4. HAP Emissions From the Capping Process:

(a) Asphalt Emulsion and Asphalt Cement Processes:

The following calculations determine the HAP UPTE based on the respective worst case emission rates, emissions before controls, and 8760 hours of operation.

(1) 1, 1, 1, Trichloroethane:	0.14 lb/hr * 8760 hr/yr * 1/2000 ton/lb	=	0.6132 ton/yr
(2) 1, 2, Epoxybutane:	0.0018 lb/hr * 8760 hr/yr * 1/2000 ton/lb	=	0.0079 ton/yr
(3) 1, 4, Dioxane:	0.0035 lb/hr * 8760 * 1/2000 ton/lb	=	0.0153 ton/yr
(4) Trichloroethylene:	0.23 lb/hr * 8760 hr/yr * 1/2000 ton/lb	=	1.007 ton/yr

(b) Surface Coating Booth:

It is determined that there are negligible HAP emissions generated from the surface coating booth.

$$\text{Total HAP UPTE: } = 0.6132 \text{ ton/yr} + 0.0079 \text{ ton/yr} + 0.0153 \text{ ton/yr} + 1.007 \text{ ton/yr} = 1.64 \text{ ton/yr}$$

5. VOC Potential Emissions:

a. Asphalt Emulsion and Asphalt Cement Processes:

All HAP emissions are determined to be equal to VOCs in this case. Thus, the VOC UPTE from the asphalt emulsion and asphalt cement processes are **1.64 tons/yr**.

b. Asphalt Extraction Process:

The following calculations determine the VOC UPTE from the asphalt extraction process based on a maximum rate of 1.41 lb/hr, emissions before controls, and 8760 hours of operation.

$$1.41 \text{ lb/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \mathbf{6.18 \text{ tons/yr}}$$

c. Surface Coating Booth:

The following calculations determine the surface coating booth UPTE based on the worst case coating scenario, the MSDS parameters from each applicable coating/solvent, emissions before controls, and 8760 hours of operation.

The worst case combination assumes the worst case coating, with the worst case binder, activator, reducer, additive, and tint used at the booth, and the use of solvent, gun cleaner, and eradicator.

$$\text{lb/gal} * \text{fraction VOC} * \text{gal/unit} * \text{unit/hr} * 8760 \text{ hr/yr} * 1/200 \text{ ton VOC/lb VOC} = \text{tons VOC/yr}$$

Material	ID	lb/gal	frac. VOC	gal/unit	unit/hr	lb VOC/day	tons VOC/yr
Coating	V-7500S	7.80	1.00	0.0096	1	1.80	0.33
Binder	7175S	6.63	0.99	0.0024	1	0.38	0.07
Activator	7699	8.24	0.62	0.0005	1	0.06	0.01
Reducer	8022S	6.57	1.00	0.0016	1	0.25	0.05
Additive	259S	7.20	0.99	0.0005	1	0.08	0.01
Tint	C9335J	7.35	0.80	0.0024	1	0.34	0.06
Gun Cleaner	CGC111	6.52	1.00	0.0096	1	1.50	0.27
Cleanup Solvent	3919S	6.40	1.00	0.0024	1	0.37	0.07
Eradicator	F006	6.51	0.99	0.0048	1	0.74	0.14
Total						5.52	1.01

Summary of UPTE

The following table summarizes the source UPTE:

	PM ton/yr	PM10 ton/yr	SO2 ton/yr	NOx ton/yr	VOC ton/yr	CO ton/yr	HAPs ton/yr
Combustion	0.60	0.60	neg.	4.90	0.30	1.00	neg.
Asphalt Extraction	-	-	-	-	6.18	-	-
Asphalt E and Cement	-	-	-	-	1.64	-	1.64
Capping	-	-	3.94	-	-	-	-
Soil Compaction	4.82	4.82	-	-	-	-	-

Aggregate Test	4.84	4.84	-	-	-	-	-
Aggregate Compact	4.82	4.82	-	-	-	-	-
Plastic Index/lim	4.82	4.82	-	-	-	-	-
Spray Booth	0.52	0.52	-	-	1.01	-	neg.
Total	20.42	20.42	3.94	4.90	9.13	1.00	1.64

EMISSIONS AFTER CONTROLS

The only emissions that are controlled are the PM/PM10 emissions from the surface coating booth. These emissions are controlled by a dry filter system with an overall control efficiency of 98%. The following calculations determine the emissions after controls.

$$\text{Emissions After Controls (tons/yr)} = \text{Emissions Before Controls} * (1 - 0.98)$$

The following table summarizes the emissions after controls.

	PM ton/yr	PM10 ton/yr	SO2 ton/yr	NOx ton/yr	VOC ton/yr	CO ton/yr	HAPs ton/yr
Combustion	0.60	0.60	neg.	4.90	0.30	1.00	neg.
Asphalt Extraction	-	-	-	-	6.18	-	-
Asphalt E and Cement	-	-	-	-	1.64	-	1.64
Capping	-	-	3.94	-	-	-	-
Soil Compaction	4.82	4.82	-	-	-	-	-
Aggregate Test	4.84	4.84	-	-	-	-	-
Aggregate Compact	4.82	4.82	-	-	-	-	-
Plastic Index/lim	4.82	4.82	-	-	-	-	-
Spray Booth	0.01	0.01	-	-	1.01	-	neg.
Total	19.91	19.91	3.94	4.90	9.13	1.00	1.64

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls due to the modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	20.42
PM-10	20.42
SO ₂	3.94
VOC	9.13
CO	1.00
NO _x	4.90

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Pollutant	Potential To Emit (tons/year)
1, 1, 1 - Trichloroethane	0.61
Trichloroethylene	1.00
1, 4 - Dioxane	0.02
1, 2 - Epoxybutane	0.01
Total Combined HAPs	1.64

The potential to emit of all criteria pollutants are less than 25 tons per year, the potential to emit of particulate matter (PM) is greater than the applicable level of 5 tons per year, and, the potential to emit of all single and combined HAPs are less than the respective applicable levels of 10 and 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.5.

County Attainment Status

The source is located in Jackson County.

Pollutant	Status
PM ₁₀	attainment or unclassifiable
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Jackson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2 and 40 CFR 52.21.
- (b) Jackson County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Comb. HAPs (tons/yr)
Source After Controls + Limits	19.91	19.91	3.94	4.90	9.13	1.00	1.64
PSD Major Source Levels	250	250	250	250	250	250	-
Part 70 Major Source Levels	-	100	100	100	100	100	10/25

- (a) This source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the 28 listed source categories.
- (b) This source is not a Title V major stationary source because no criteria pollutant potential to emit (PTE) exceeds the applicable level of 100 tons/yr, no single hazardous air pollutant PTE exceeds the applicable levels of 10 tons/yr, and the combined hazardous air pollutant PTE does not exceed the applicable level of 25 tons/yr.

Federal Rule Applicability

New Source Performance Standards (NSPS):

There are no New Source Performance Standards (326 IAC 12 and 40 CFR Part 60) that apply to the proposed source.

National Emission Standards for Hazardous Air Pollutants (NESHAPs):

There are no National Emission Standards for Hazardous Air Pollutants (326 IAC 14 and 20 and 40 CFR Part 61 and 63) that apply to this proposed source.

State Rule Applicability

1. Entire State Rule Applicability:

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)):

The processes of this source will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting):

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not in one of the listed source categories, and does not emit more than 100 tons per year of any regulated pollutants.

326 IAC 5-1-2 (Opacity Limitations)

Opacity shall not exceed an average of 40% in any one 6 minute averaging period. Opacity shall not exceed 60% for more than a cumulative total of fifteen minutes.

2. Individual State Rule Applicability:

326 IAC 6-3 (Process Operations), Surface Coating Booth:

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the surface coating booth shall not exceed the limits established utilizing the following equation:

$$E = 4.10 * P^{0.67}$$

where: E = rate of emission in pounds per hour,
P = process weight in tons per hour

326 IAC 6-3 (Process Operations):

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the soil compaction, aggregate testing, aggregate compaction, and plastic index and liquid limit processes shall be limited as follows:

The process weight rate for the source is 40 lb/hr. Since the process weight rate is less than 100 lb/hr, the PM emissions shall be limited to 0.551lb/hr, the emissions rate equivalent to the low end process weight rate of 100 lb/hr.

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the following equation:

$$E = 4.10 * P^{0.67}$$

where: E = rate of emission in pounds per hour,
P = process weight in tons per hour (1.64 tons/hr)

326 IAC 7-1.1 (SO2 Limitations):

The SO2 PTE from the sulfur capping process is less than 25 tons/yr and the actual emissions are less than 10 lb/hr. Therefore, 326 IAC 7-1.1 does not apply. No other Article 7 rules apply.

326 IAC 8-2-9 (VOC Content Limit):

326 IAC 8-2-9 does not apply to the surface coating booth because the actual VOC emissions are less than 15 lb/day.

To demonstrate that the surface coating booth VOC emissions are less than 15 lb/day, the source shall be required to determine the daily VOC emissions and keep records of the emissions determined.

326 IAC 8-1-6 (BACT Requirements):

Although no other Article 8 rules apply, 326 IAC 8-1-6 does not apply because the VOC PTE from the asphalt extraction, asphalt emulsion, and asphalt cement processes, and the surface coating booth, each, are less than 25 tons/yr.

Conclusion

This proposed source shall be operated according to the conditions specified in registration No. **071-13764-00031**.